

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:24-cv-24089-CMA

**ELIZABETH SANTIAGO-DURAN,
and all others similarly situated**

CLASS ACTION

Plaintiff,

v.

**VANGUARD PARKING SOLUTIONS
INC and PENN CREDIT
CORPORATION,**

Defendants.

_____ /

NOTICE OF HEARING BEFORE MAGISTRATE JUDGE

Plaintiff, Elizabeth Santiago-Duran (“Plaintiff” or “Santiago-Duran”), pursuant to the Standing Discovery Order for Magistrate Judge Lisette M. Reid, hereby provides notice of a discovery hearing that has been scheduled to be held on January 15, 2025, at 1:30 PM via Zoom (Meeting ID: 160 217 5188; Passcode: 877806) before Magistrate Judge Lisette M. Reid on the following matters:

1. Plaintiff’s motion to compel Defendant, Vanguard Parking Solutions Inc. to disclose, as part of its Rule 26A disclosures, (i) the identity of the owner of the parking garage at issue or (ii) if it has no contractual relationship with the owner, the person or entity for whom it was acting in purporting to issue the parking invoices at issue.

CERTIFICATE OF PRE-FILING CONFERRAL (LOCAL RULE 7.1(A)(2))

Counsel for the movant has conferred with all parties or non-parties who may be affected by the relief sought in the motion in a good faith effort to resolve the issues raised in the motion and has been unable to do so.

Respectfully Submitted,

LINES LAW, PLLC
201 Alhambra Circle, Suite 1060
Coral Gables, Florida 33134
Telephone: 786-634-4306

/s/ Matthew L. Lines
Matthew L. Lines
Florida Bar No. 243980
E-mail: lines@lineslaw.com

Co-Counsel for Plaintiff

PATTI ZABALETA LAW GROUP
3323 Northwest 55th Street
Fort Lauderdale, Florida 33309
Telephone: 561-542-8550

/s/ Thomas Patti
Thomas Patti
Florida Bar No. 118377
E-mail: tom@pzlg.legal
Victor Zabaleta
Florida Bar No. 118517
E-mail: victor@pzlg.legal

Co-Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 8, 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Thomas Patti
Thomas Patti
Florida Bar No. 118377